

**REMARKS**

Applicants respectfully request favorable reconsideration of this application, as amended.

By this Amendment, Applicants have amended Claims 1 and 9 to more particularly recite subject matter which Applicants regard as their invention, as discussed in detail below. Claims 3, 4 and 16 have also been amended for consistency. Claims 17 and 21 have been cancelled without prejudice or disclaimer to reduce the issues. Claims 5, 10, 11, 14, 18 and 19 were previously cancelled without prejudice or disclaimer. Thus, Claims 1-4, 6-9, 12, 13, 15, 16 and 20 are pending.

In the Office Action, Claims 1-4, 6-9, 12, 13, 15-17, 20 and 21 were rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,859,650 to Ritter ("*Ritter*") in combination with U.S. Patent No. 6,684,269 to Wagner ("*Wagner*").

Without acceding to the rejection, Claim 1 has been amended to recite, *inter alia*, delegating, in response to receiving an event, execution of a smart-card operation to an additional application program stored in a data storage unit of a remote application server, and that the delegating comprises sending a message for processing from the reporter-type application to the master-type application of the remote application server via a channel of a mobile telephone network, and receiving, by a slave-type application program, commands from the master-type application program using said mobile telephone network, and retransmitting results of executing commands to the master-type application program using said mobile telephone network. Support is provided, for example, in FIG. 5 and Steps 8 and 9 on page 20 of the present disclosure (paragraphs [0158] and [0159] of the published application). It

is apparent that the applied references do not teach or suggest this combination of features.

In contrast, *Ritter* teaches exchanging data and programs between a mobile apparatus 1 (having a SIM card 2 including a GSM controller 20) and an “outside device 3” using either a contactless, infrared transceiver interface, or “another” two-way electromagnetic interface via an antenna 15 included in the housing 18 of the mobile apparatus:

“By means of this interface, the mobile apparatus can . . . exchange data and programs contactlessly [inductively or electromagnetically] [with] an outside device 3 [3’] without making use of the mobile radio network 4.”

*Ritter*, col. 4, lines 14-17 and 49-53 (underline added).

Thus, it is clear that *Ritter* does not teach or suggest sending a message for processing from a reporter-type application to a master-type application of a remote application server via a channel of a mobile telephone network, and receiving, by a slave-type application program, commands from the master-type application program using said mobile telephone network, and retransmitting results of executing commands to the master-type application program using said mobile telephone network, as recited in Claim 1.

Furthermore, *Ritter*’s messaging between the SIM card 2 and a SIM server 5 for value-added services and authentication messaging is disclosed as taking place with one or more application servers 9 via the SIM server 5, and with a TTP server 7 via the SIM server 5, respectively. *Ritter*, col. 5, line 57 to col. 6, line 10; and col. 6, lines 26-32. Thus, it appears that *Ritter* does not teach or suggest sending a message and receiving commands between a smart card and a remote application server via the mobile telephone network channel, as recited in Claim 1.

Secondary reference *Wagner*, for its part, is directed to a system and method in which “an extended open system protocol” is used to permit I/O devices to communicate with a server through an open network. See *Wagner*, Abstract, col. 5, lines 46-59. *Wagner*’s I/O devices include smart cards and others that are not typically configured to communicate with a server using an “open network” such as the Internet. *Wagner*, col. 3, lines 46-65.

However, *Wagner* teaches communications between the smart card and a server that are limited to communications using the Internet. See e.g., *Wagner*, col. 10, lines 55-60. Thus, it is clear that *Wagner* does not teach or suggest sending a message for processing from a reporter-type application to a master-type application of a remote application server via a channel of a mobile telephone network, and receiving, by the slave-type application program, commands from the master-type application program using said mobile telephone network, and retransmitting results of executing commands to the master-type application program using said mobile telephone network, as recited in Claim 1.

Therefore, Applicants respectfully submit that Claim 1 distinguishes patentably from the applied references.

In addition, Claim 9 as amended also recites, *inter alia*, that the delegating comprises sending a message for processing from the reporter-type application to the master-type application of the remote application server via a channel of the mobile telephone network, the slave-type application program receives commands from the master-type application program of the remote application server using the mobile telephone network, and retransmits results of the execution of commands to the

master-type application program of the remote application server using the mobile telephone network.

Thus, it is apparent that Claim 9 also distinguishes patentably from the applied references for at least the reasons discussed above with respect to Claim 1.

Furthermore, Applicants further note that the present invention is directed to a method for processing and transmitting digital data in a mobile telephone network, particularly using the GSM standard, that makes it possible to offer the users of mobile telephones in this network services that can be offered with applications compliant with SIM Toolkit technology, while eliminating limitations on memory and performance encountered in the development of applications in smart cards. *See* para. [0041] of Applicants' published application.

For example, embodiments advantageously use the fact that applications compliant with SIM Toolkit technology can specifically send short messages and can also handle the execution of instructions upon reception of other short messages that are sent to them. Accordingly, the mobile telephone network architecture according to the present invention comprises an architecture in which SIM applications: 1) inform applications installed in at least one remote server of the arrival of events issuing from a unit of mobile equipment (the informing provided by "reporter applications"); and 2) execute commands and instructions in response to the request for applications implemented in the servers (the executing provided by "slave applications"). Thus, it is possible to delegate the execution of intensive operations that use a lot of computer resources, which in the prior art is performed in the SIM smart card, to applications implemented in remote servers. *See* paras. [0042] to [0046] of Applicants' published application.

None of the applied references appear to teach or suggest a system and method comprising both a reporting-type application and a slave-type application in the smart card, as recited in Claims 1 and 9.

Therefore, Claims 1 and 9 are believed to be patentable over the applied references.


Dependent Claims 2-4, 6-8, 12, 13, 15, 16 and 20 are also believed to be patentable based on their dependence from Claims 1 and 9, as well as for the additional subject matter recited in Claims 1-4, 6-9, 12, 13, 15, 16 and 20.

In view of the foregoing, Applicants respectfully submit that this application is in condition for allowance. A Notice of Allowance is respectfully requested.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (T2146-907758) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

MILES & STOCKBRIDGE P.C.

By:   
Edward J. Kondracki  
Reg. No. 20,604

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Eric G. King  
Reg. No. 42,736

1751 Pinnacle Drive, Suite 500  
McLean, Virginia 22102-3833  
Telephone: (703) 610-8651  
4818-6247-6545